

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143
The Honorable Judge Ellis

Pretrial Conference: May 7, 2021
Trial: July 12, 2021

**DEFENDANT'S SUPPLEMENT TO
MOTION FOR LEAVE TO FILE RULE 12.2(B) NOTICE OF EXPERT EVIDENCE OF
A MENTAL CONDITION BEARING ON LACK OF GUILT (ECF 299)**

Zackary Ellis Sanders, through undersigned counsel, respectfully submits the attached supplemental authority in further support for his Motion For Leave To File Rule 12.2(B) Notice Of Expert Evidence Of A Mental Condition Bearing On Lack Of Guilt (ECF 299).

Respectfully submitted,

ZACKARY ELLIS SANDERS
By Counsel

/s/

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CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of May 2021, the foregoing was served electronically on counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/
Nina Ginsberg